

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JULIO TARDIO, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

NEW ORIENTAL EDUCATION &
TECHNOLOGY GROUP, INC., LOUIS T.
HSIEH, and MICHAEL MINHONG YU

Defendants.

Civil Action No. 12-cv-06619-JGK

JURY TRIAL DEMANDED

ECF CASE

**NOTICE OF JULIO TARDIO'S MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that Lead Plaintiff Julio Tardio ("Lead Plaintiff"), on behalf of himself and the putative Class, respectfully moves the Court, at a date and time to be set by the Court, for an Order pursuant to Rule 23(e) of the Federal Rules of Civil Procedure (a) preliminarily approving the proposed Settlement of the above-captioned securities class action lawsuit (the "Action"); (b) approving the form and manner of providing notice of the Settlement to the Class; (c) certifying the Class for settlement purposes; (d) appointing Tardio as Class Representative and Faruqi & Faruqi, LLP as Class Counsel for settlement purposes; and (e) setting a hearing date for final approval of the Settlement, the proposed Plan of Allocation, and Lead Counsel's motion for an award of attorneys' fees and reimbursement of litigation expenses.

This motion is based upon the accompanying Memorandum of Law in Support of Julio Tardio's Motion for Preliminary Approval of the Class Action Settlement, the Declaration of

Nadeem Faruqi in Support of Julio Tardio's Motion for Preliminary Approval of the Class Action Settlement, and all related exhibits.

Attached hereto as Exhibit A is the proposed Order Preliminarily Approving Proposed Settlement and Providing for Notice.

Dated: May 23, 2014

FARUQI & FARUQI, LLP

/s/ Nadeem Faruqi

Nadeem Faruqi

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